

HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

COMPASS, INC. AND COMPASS  
WASHINGTON, LLC

Plaintiffs,

v.

NORTHWEST MULTIPLE LISTING  
SERVICE,

Defendant.

Case No. 2:25-cv-00766-JNW

SUPPLEMENTAL DECLARATION OF  
CHRISTOPHER R. OSBORN IN  
SUPPORT OF DEFENDANT  
NORTHWEST MULTIPLE LISTING  
SERVICE'S MOTION FOR  
PROTECTIVE ORDER TO STAY  
DISCOVERY

I, Christopher R. Osborn, certify and state as follows:

1. I am an attorney practicing at Stoel Rives LLP in Seattle, Washington, and am counsel of record for Defendant Northwest Multiple Listing Service ("NWMLS") in this matter. I am over the age of 18 and have personal knowledge of the facts set forth in this declaration.

2. On July 24, 2025, briefing on NWMLS's Motion for Protective Order to Stay Discovery closed. *See* Dkt. 29, 35.

3. On July 25, 2025, at 7:12 a.m. PT, Plaintiffs Compass, Inc. and Compass Washington, LLC (collectively, "Compass"), through counsel, emailed counsel for NWMLS: (1) Compass's Second Set of Requests for Production to NWMLS, and (2) a Notice of Intent to Issue Subpoena to Produce Documents to non-party Windermere Real Estate Services Company

SUPPLEMENTAL DECLARATION IN SUPPORT OF MOTION FOR PROTECTIVE  
ORDER TO STAY DISCOVERY - 1  
(Case No. 2:25-CV-00766-JNW)

1 (collectively, the “Additional Discovery”). True and correct copies of the Additional Discovery  
2 are attached as **Exhibit A** and **Exhibit B**.

3 4. NWMLS submits this supplemental declaration to complete the record applicable  
4 to its pending Motion for Protective Order to Stay Discovery, as the Additional Discovery was  
5 provided immediately after briefing on the motion had been completed, and it is NWMLS’s  
6 position that the Additional Discovery is subject to the relief requested under the pending motion.

7 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
8 knowledge.

9 DATED: August 1, 2025.

10 s/ Christopher R. Osborn  
11 Christopher R. Osborn, WSBA No. 13608  
12 Stoel Rives LLP  
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SUPPLEMENTAL DECLARATION IN SUPPORT OF MOTION FOR PROTECTIVE  
ORDER TO STAY DISCOVERY - 2  
(Case No. 2:25-CV-00766-JNW)

**CERTIFICATE OF SERVICE**

I, John Bullinger, certify that I am a Practice Assistant of the law firm Stoel Rives LLP, a resident of the state of Washington, over the age of 18 years, not a party to these proceedings or interested herein, and am competent to serve as a witness herein. My business address is that of Stoel Rives LLP, 600 University Street, Suite 3600, Seattle, WA 98101.

On August 1, 2025, I caused a true and correct copy of the forgoing document to be served upon the following parties as below:

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I declare under penalty of perjury under the laws of the State of Washington that the foregoing statements are true and correct.

DATED at Seattle, Washington, this 1<sup>st</sup> day of August, 2025.

s/ John Bullinger  
John Bullinger, Legal Practice Assistant  
Stoel Rives LLP

SUPPLEMENTAL DECLARATION IN SUPPORT OF MOTION FOR PROTECTIVE  
ORDER TO STAY DISCOVERY - 3  
(Case No. 2:25-CV-00766-JNW)